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**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AEDES DE VENUSTAS, INC.,	:	Civil Action No.: 1:07-04530 (LTS)
	:	
Plaintiff,	:	NOTICE OF MOTION FOR A
	:	PROTECTIVE ORDER TO BAR
	:	PLAINTIFF FROM DEPOSING OR
v.	:	DEMANDING DOCUMENTS OF
	:	NON-PARTY ALLEN SILK, ESQ.
VENUSTAS INTERNATIONAL, LLC,	:	
	:	
Defendant.	:	Motion Returnable: _____
	:	Honorable Laura Taylor Swain
	:	Magistrate Judge Theodore Katz

Documents Electronically Filed

PLEASE TAKE NOTICE that pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Defendant, Venustas International, LLC, hereby moves this Court for an order granting a Protective Order under Fed.R.Civ. P. 26(c) to Bar Plaintiff from Deposing or Demanding Documents of Non-Party Allen Silk, Esq.

As grounds for this motion, Defendant sets forth the accompanying Memorandum of Points and Authorities in Support of Its Motion for a Protective Order under Fed.R.Civ. P. 26(c)

to Bar Plaintiff from Deposing or Demanding Documents of Non-Party Allen Silk, Esq., with the attached Declaration of Robert G. Shepherd, and [Proposed] Order which together demonstrate that the information sought by the Plaintiff through this deposition is irrelevant to further proceedings in this case and is therefore burdensome and that Defendant Venustas is entitled to a Protective Order barring Plaintiff from taking the deposition or demanding documents of Non-Party Allen Silk, Esq. pursuant to Fed.R.Civ.P. 26(c) and current case law.

Movant used its best efforts, including a telephone conference with Plaintiff's counsel as well as an exchange of letters with Plaintiff, to resolve informally with Plaintiff the matters raised in Defendant's Motion for a Protective Order under Fed.R.Civ. P. 26(c) to Bar Plaintiff from Deposing or Demanding Documents of Non-Party Allen Silk, Esq.

Dated: February 11, 2008

BY: s/ Robert G. Shepherd
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